

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

ADVANCED TECHNOLOGY)
SYSTEMS COMPANY)
Plaintiff,) No. 23-1000 C
v.) Judge _____
THE UNITED STATES,)
Defendant.)

)

TO BE FILED UNDER SEAL

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Paragraph 4 of Appendix C of the Rules of the Court of Federal Claims, Plaintiff Advanced Technology Systems Company (“ATSC”) respectfully requests leave of the Court to file ATSC’s Complaint and the exhibits to ATSC’s Complaint under seal in the above-captioned action. Defendant’s counsel has confirmed that Defendant does not oppose this motion.

ATSC’s Complaint and exhibits contain information that is proprietary and otherwise confidential business information relating to ATSC and the proposal to be submitted in response to the solicitation at issue in this protest. The public release of this information would cause competitive harm to ATSC.

Accordingly, ATSC respectfully requests the Court grant this request to file its Complaint and exhibits under seal.

June 29, 2023

Respectfully submitted,

s/Anuj Vohra
Anuj Vohra
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